



December 11, 2019

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Ex Parte Notice
IBFS File No. SAT-LOA-20190704-00057; Call Sign S3051**

Dear Ms. Dortch:

Representatives from Amazon met with staff from the Federal Communications Commission's International Bureau on December 9, 2019 to discuss how the proposed Kuiper System will expand access to satellite broadband services throughout the world and bring public-interest benefits to consumers.¹ Meeting participants on behalf of Amazon included Julie Zoller, Mariah Shuman, Darren Achord, and David Kaufman of Amazon; and Trey Hanbury and George John of Hogan Lovells US LLP. Meeting participants on behalf of the Commission included Jose Albuquerque, Stephen Duall, Jennifer Gilsenan, Kerry Murray, and Alan Thomas.

During the meeting, Amazon encouraged the Commission to grant the Application and associated waivers expeditiously, consistent with the Commission's rules. Amazon has provided all required information for the Commission to process the Application.

The data demonstrates that the Kuiper System will have no material impact on the Ka-band Non-Geostationary Satellite Orbit ("NGSO") environment when operators coordinate in good faith.² Amazon also committed to initiate good faith coordination with NGSO operators to maximize spectral efficiencies while minimizing the likelihood of harmful interference.

¹ Kuiper Systems LLC ("Kuiper") is a wholly owned subsidiary of Amazon.com Services, Inc. (collectively "Amazon"). *See generally* Application of Amazon, File No. SAT-LOA-20190704-00057, Call Sign S3051 (filed July 4, 2019) ("Application").

² After excluding the Boeing and LeoSat systems and adding the Kuiper System to the simulation, Amazon simulated the operational environment of the NGSO processing round participants to establish their reasonable spectrum sharing expectations.



Expedientiously processing the Application and granting the waivers Amazon has sought will accelerate the deployment of an innovative new system that will bring innumerable benefits to consumers worldwide. Please contact me with any questions.

Respectfully submitted,

/s/ **Mariah Shuman**

Mariah Shuman
Corporate Counsel, Project Kuiper
Kuiper Systems LLC,
an Amazon subsidiary